

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
AIKEN DIVISION**

APRIL WESOLOWSKI, ON BEHALF]
HERSELF AND AS ADMINISTRATOR] C/A #:
AD LITEM OF THE ESTATE]
OF GEORGE THACKER,]
Plaintiffs,]
vs.]
UNITED STATES OF AMERICA,]
Defendants.]

**NOTICE OF INTENT TO FILE SUIT
(*Jury Trial to be Demanded*)**

Pursuant to S.C. Code § 15-79-125, the Plaintiff April Wesolowski, on behalf of herself and as Administrator Ad Litem hereby files this Notice of Intent to File Suit. Attached as Exhibit 1 and incorporated by reference, is a draft Complaint providing a statement of Plaintiff's factual allegations and legal claims, namely that Defendants individually and collectively failed to provide George Thacker appropriate and needed care and violated the standard(s) of care applicable to Mr. Thacker, resulting in his death. The draft Complaint shall serve as Plaintiff's "short and plain statement of the facts showing the party is entitled to relief," as required by S.C. Code Ann. § 15-79-125(A).

Attached as Exhibit 2 and incorporated by reference is an Affidavit of Merit of an expert witness that delineates at least one negligent act or omission giving rise to this case and the factual basis thereof.

Attached as Exhibit 3 are answers to the Standard Interrogatories as set forth in Rule 33(b) of the South Carolina Rules of Civil Procedure.

STROM LAW FIRM, LLC

s/ Mario A. Pacella

Mario A. Pacella (Fed. I.D. No. 7538)

Amy E. Willbanks (Fed. ID. No. 13537)

Bakari T. Sellers (Fed. I.D. No. 11099)

6923 N. Trenholm Rd.

Columbia, SC 29206

Phone: (803) 252-4800

Fax: (803) 252-4801

mpacella@stromlaw.com

[aillbanks@stromlaw.com](mailto:awillbanks@stromlaw.com)

Bsellers@stromlaw.com

This 23rd day of April, 2025

